JOSEPH T. MCNALLY 1 Acting United States Attorney 2 LINDSEY GREER DOTSON Assistant United States Attorney 3 Chief, Criminal Division FILED ROBERT J. KEENAN (Bar No. 151094) CLERK, U.S. DISTRICT COURT Assistant United States Attorney 4 U.S. ATTORNEY'S OFFICE 02/20/2025 5 411 W. Fourth Street Suite 8000 CENTRAL DISTRICT OF CALIFORNIA 6 Santa Ana, California 92701 Telephone: (714) 338-3597 kdu DEPUTY BY: Facsimile: (714) 338-3708 7 E-Mail: rob.keenan@usdoj.gov 8 Attorneys for Plaintiff UNITED STATES OF AMERICA 9 10 11 UNITED STATES DISTRICT COURT 12 CENTRAL DISTRICT OF CALIFORNIA 13 SOUTHERN DIVISION 14 15 UNITED STATES OF AMERICA, Case No. 8;24-CR-101-DOC GOVERNMENT'S UNOPPOSED EX PARTE 16 Plaintiff, APPLICATION FOR ORDER UNSEALING 17 INDICTMENT AND CASE FILE V. 18 THOMAS WILLIAM HANSEN, DATE: No Hearing 19 Defendant. TIME: No Hearing 2.0 2.1 22 The government hereby applies ex parte for an order directing 23 that the Indictment on file in the above-captioned case, together 24 with the rest of the case file, be unsealed and the prior sealing 25 order be vacated. 26 Defendant THOMAS HANSEN does not oppose this Application.

Indeed, defense counsel was the first to alert the government's

counsel of the need for this Application.

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The indictment in this case was filed on August 7, 2024. On the same day, the government applied for and obtained an order placing the indictment and all other documents in the case under seal pending the arrest of the defendant. In substance, the sealing order provided that the case should remain under seal until the defendant made his first appearance before this Court.

On January 30, 2025, defendant first appeared before the Court's Duty Magistrate in Santa Ana. Because defendant previously appeared for a detention hearing in the Middle District of Florida, government counsel and the Court in this district did not address whether the case was still under seal, or needed to remain sealed, at the time of defendant's arraignment.

Earlier today, when government counsel tried to electronically file the parties' Stipulation to Continue the Trial and Designate Excludable Time Under the Speedy Trial Act, counsel discovered that the case file is not detectible or accessible via the Court's CM/ECF system. Accordingly, the Indictment and the entire case file need to be unsealed and made accessible via the CM/ECF system. Because defendant has been arrested and is well aware of the case, there is no further need for the case to remain sealed.

DATED: February 20, 2025.

JOSEPH T. MCNALLY
Acting United States Attorney

LINDSEY GREER DOTSON
Assistant United States Attorney
Chief, Criminal Division

/s/ R.J.K.

ROBERT J. KEENAN
Assistant United States Attorney

Attorneys for Plaintiff UNITED STATES OF AMERICA

PROOF OF SERVICE

I am a citizen of the United States and a resident of Orange County, California. I am over 18 years of age, and I am not a party to the above-entitled action. My business address is the United States Attorney's Office, Ronald Reagan Federal Building and United States Courthouse, 411 West Fourth Street, Suite 8000, Santa Ana, California 92701.

On this date, February 20, 2025, I served a copy of the attached document, GOVERNMENT'S UNOPPOSED EX PARTE APPLICATION FOR ORDER UNSEALING INDICTMENT AND CASE FILE, and the accompanying [PROPOSED] ORDER, on defendant's counsel by e-mailing the documents to the following e-mail address:

Adithya_Mani@fd.org

I declare under penalty of perjury that the foregoing is true and correct. Executed on **February 20**, **2025**, at Santa Ana, California.

/s/ R.J.K.
Robert J. Keenan